

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

John Doe (a pseudonym) and Jane Doe (a
pseudonym),

Plaintiffs,

-against-

Markel, Evanston Insurance Company,

Defendant.

Index No. 24-cv-09670-VLB-KHP

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the
respective parties that:

1. The Temporary Sealing Order entered on December 16, 2024, by Hon. Valerie Caproni, U.S.D.J., under Index No. 24-mc-574, shall be modified to allow ECF filing of documents in this matter under the above caption.
2. Plaintiffs have until February 14, 2025, to file a motion to proceed under anonymous designations and, pending an Order on such motion, all pleadings, documents, filings and/or correspondence should use the John Doe and Mary Doe designation in the place of the Plaintiffs' names, and that any information which would result in the identity of the Plaintiffs be redacted in order to maintain the anonymous designation.
3. Plaintiffs have until February 14, 2025 to file a motion to continue the proceedings in this matter under seal. If no such motion is made, the matter shall be unsealed.
4. Defendant shall have until January 31, 2025 to answer, move, or otherwise respond to the Complaint; and
4. Plaintiff shall have until January 31, 2025 to file a motion to remand to state court.

Dated: December 19, 2024
New York, New York

RESPECTFULLY SUBMITTED:

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| SKARZYNSKI MARICK & BLACK | EPSTEIN LEGAL SERVICES, P.C. |
| By: <u>/s/ Evan Shapiro</u> Evan Shapiro, Esq. One Battery Park Plaza, 32nd Floor New York, New York 10004 (212) 820-7712 | By: <u>/s/ Darren Epstein</u> Darren Epstein, Esq. 254 South Main Street, Suite 406 New City, NY, 10956 (845) 634-6800 |
| <i>Attorneys for Defendant</i> | <i>Attorney(s) for Plaintiffs</i> |

Application granted.

Defendant's deadlines to respond to the complaint and to move to remand are extended to January 31, 2025.

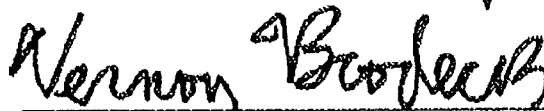
Plaintiff is granted leave to proceed anonymously until February 14, 2025.

If Plaintiff files a motion to proceed anonymously by February 14, 2025, leave to proceed anonymously is extended until the Court's decision on Plaintiff's motion.

The Court construes paragraph 1 of the Stipulation as a joint motion to partially unseal the case. The motion is GRANTED. The parties shall file a joint letter no later than January 17, 2025 regarding their respective position(s) whether and why any documents should continue to be filed with restricted access (only to the Court and the parties).

The Clerk of Court is respectfully directed to unseal the case, and to file all case documents, including this order, under the selected party viewing level.

SO ORDERED: 12/19/2024



HON. VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE